

THE INTERNATIONAL BUSINESS LAW FIRM P.C.

Arlington Office:

3511 North Thirteenth Street  
Arlington, Virginia 22201-4907 U.S.A.

Telephone: (703) 522-1198  
Fax: (703) 522-1197

July 28, 1998

Mr. Richard Wulff, Esq.  
Office of Small Business, Mail Stop 7-8  
Securities and Exchange Commission (SEC)  
450 5th Street N.W.  
Washington, DC 20549

Facsimile: 202.942.9516

Dear Mr. Wulff:

Re: Effective Date Request  
Baltia Air Lines, Inc. (The Company)  
SB-2 Registration Statement  
File No. : 333-37409

The Issuer and Underwriters hereby request an effective date for referenced Registration Statement of September 10, 1998.

The previously proposed August date has been moved to a firm September date on the premise that a September date will make a stronger offering. The Company will submit fresh financials in its filing of Amendment No. 7. Thank you for your assistance throughout this filing.

Sincerely,

Baltia Air Lines, Inc

by Steffanie J. Lewis Date: 7-28-98  
Steffanie J. Lewis  
The International Business Law Firm, PC

Seen and Agreed:

Howblower & Weeks, Inc. and  
Madison Capital Corp

by Charlie Spinelli Date: 8/5/98  
Charlie Spinelli  
Spinelli & Associates  
120 Wall Str., 28<sup>th</sup> Floor  
New York, NY 10005